



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

July 8, 2013

**Re: Pike County
Pike Sanitation Landfill
Facility ID #0666000003
Title V Inspection
Notice of Violation-Non-HPV
General Non-compliance**

Mr. Michael Migyanko
Pike Sanitation Landfill
123 South Lock Street
Waverly, Ohio 45690

Subject: Summary of 2013 Title V Full Compliance Evaluation

Dear Mr. Migyanko:

On June 20, 2013, I performed a Title V full compliance evaluation of Pike Sanitation Landfill in Waverly, Ohio. The inspection was conducted to determine the facility's compliance with the applicable state and federal air pollution rules and regulations.

While at the facility, I met with you and Steve Thrasher, representing Pike Sanitation Landfill and Dan Brennan of SCS Engineers. During the visit, I reviewed records and performed a visual inspection of the facility. Accompanying this letter is a copy of Ohio EPA's Facility Inspection Forms (Appendix N).

The facility's permitted non-insignificant emissions units include the following:

F001 – Asbestos/Refuse Handling;
F002 – Roadway/Parking;
P001 – Diesel Engine 180 HP; and
P002 – Diesel Engine 180 HP.

The Title V permit for this facility was effective as a Final permit on April 29, 2003, and expired on April 29, 2008. The Title V renewal application was submitted timely on December 14, 2007, and pursuant to OAC rule 3745-77-08(E)(1), all provisions and authorizations of the expired permit will remain in effect until the Director's final action on the pending renewal application.

During my file review of the daily visible emission inspections log for emissions unit F002, I saw that the log only noted whether control measures were implemented, but did not have a space to note if the inspection was performed and no control measures

were implemented. Mr. Thrasher and I discussed adding a section to make this notation with we both agreed that would be a more accurate representation of the daily inspections.

While reviewing the asbestos logs, I noticed that GIS information was missing from the forms for all loads in the first half of 2013. Mr. Thrasher explained that those GIS locations had been captured, but not added to the forms. He agreed to forward that data to me and to add it to the forms.

Based on my inspection, file review, and reports submitted, Pike Sanitation Landfill appears to be in compliance with all applicable air pollution control regulations with the exception of the following:

VIOLATIONS:

1. In accordance with Part III.A.1.2e of the Title V permit number: P0090476, The permittee shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" ("Plan") consisting of: authorized personnel training, inspection and disposal operating procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emissions control equipment, record keeping procedures, and emergency notification procedures. Authorized personnel shall be knowledgeable in the procedures, and the Plan shall be available for inspection at this facility at all times.

At the time of the inspection, I requested to review the Asbestos Disposal Operating Procedure and Spill Contingency Plan. Mr. Thrasher informed me that the plan was kept at the scale house and that I could review it there. After my exit interview with Mr. Thrasher and Mr. Brennan, I stopped by the scale house to review the plan. I inquired about the plan and the scale house attendant did not show any familiarity with the plan and was not able to locate it. He showed me a one page asbestos load procedure that was tacked to a bulletin board. This "procedure" did not meet the condition of the permit for the Asbestos Disposal Operating Procedure and Spill Contingency Plan.

Within fourteen (14) days of receipt of this notice, please submit to our office the following information:

- A copy of your Asbestos Disposal Operating Procedure and Spill Contingency Plan and a notation as to where the plan will be housed at the facility; and
- Any clarifications, responses, explanations or evidence on your behalf pertaining to the above-stated violations.

Acceptance by Ohio EPA of this information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in section 3704.06 of the Ohio Revised

Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

The assistance provided during the inspection is greatly appreciated. If you have any questions, feel free to contact me at (740) 380-5275 or by email at sara.anderson@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sara Anderson', with a large, stylized flourish extending to the right.

Sara Anderson, R.S.
Environmental Specialist II
Division of Air Pollution Control
Southeast District Office

SA/dh

Enclosure: Title V Inspection Forms

cc: Dean Ponchak, DAPC, SEDO

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

Section A, Part 1

1. Date of inspection: 6/20/2013 Arrival Time: 9:52 a.m. Departure Time: 11:30 a.m.
2. Inspection announced? Yes No
3. Facility identification number: 0666000003 County: Pike
4. Primary facility contact: Steve Thrasher
5. Company name and address: Pike Sanitation Inc. 11775 State Route 220 East, Waverly, Ohio 45690
6. Mailing address (if different from above): 123 South Lock Street, Waverly, Ohio 45690

7. List all pollutants regulated at the facility (mark all that apply):
 Particulate Emissions Organic Compounds Volatile Organic Compounds
 Carbon Monoxide Nitrogen Oxides Sulfur Dioxide Lead HAPs
 Fluorides (excluding hydrogen fluoride) Sulfuric Acid Mist Hydrogen Sulfide
 Total Reduced Sulfur Non-Methane Organic Compounds from Municipal Waste Landfills
 Mercury Beryllium Vinyl Chloride Air Toxics
8. Facility type (mark only one):
 Title V FESOP Mega-Site State PTO (*Minor, Non-TV*)
- 9a. Applicable federal regulations (mark all that apply):
 NESHAPS MACT NSPS PSD Emissions Offset SMPTI (PSD/NSR)
- 9b. If applicable, please specify federal regulation(s): 40 CFR Part 61 Subparts A and M, 40 CFR Part 60, Subpart WWW
10. Compliance monitoring category (mark all that apply):
 Full Compliance Evaluation Partial Compliance Evaluation Investigation (CMS)

Section A, Part 2

- 1a. Is the facility in compliance with the facility-wide operational, record keeping, and reporting requirements of its permit terms and conditions? Yes No N/A (If no, explain in Section A, part 3)
- 2a. For those facilities that have received a final Title V permit, was an annual certification of compliance submitted as required by OAC 3745-77-07(C)(5)? Yes No N/A
If received, date received: 4/30/2013 date reviewed: 7/3/2013
- 2b. Does the annual compliance certification comply? Yes No (If no, explain in Section A, part 3)

Section A, Part 3

- 1a. Has the OEPA or local air agency taken enforcement action against the company within the last 5 years?
 Yes No N/A
- 1b. If yes, identify the emissions units and describe the enforcement action(s): _____

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

FACILITY-WIDE INFORMATION

2a. Compliance Evaluation:

No violations were discovered, based on inspector's observations

The following violations were discovered: P0090476 Title V Permit III.A.I.2e - Pike Sanitation was not able to produce a copy of their Asbestos Disposal Operating Procedure and Spill Contingency Plan. Scale house staff had no knowledge of the plan.

2b. If violations were discovered, were non-compliance issues reviewed verbally with the permittee during an exit interview or while conducting the inspection and in writing after the inspection?

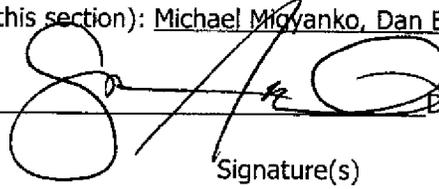
Yes No

3. Additional notes and comments: Mr. Thrasher explained that the Asbestos Disposal Operating Procedure and Spill Contingency Plan was available for review in the scale house. At the close of our exit interview, I stopped by the scale house to look at the plan. It was not available for my review. However, the scale house attendant showed me a one page asbestos load procedure that was tacked to a bulletin board. This "procedure" did not meet the condition of the permit for the Asbestos Disposal Operating Procedure and Spill Contingency Plan.

4. Name of individual company representatives or consultants interviewed during inspection (if different than the primary contact identified in part 1 of this section): Michael Migyanko, Dan Brennan

Inspector(s): Sara Anderson

Print Name(s)



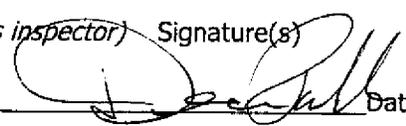
Signature(s)

Date: 7/8/2013

Permit Writer: _____

Date: _____

Print Name(s) *(unless same as inspector)* Signature(s)



Evaluator: Dean Ponchak

Print Name(s)

Signature

Date: 7/8/2013

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

5a. Were visible emissions observations (VEOs) performed? Yes No N/A
5b. If No, explain why not (*see instructions for guidance*): Facility is performing daily monitoring and record keeping. No visible emissions were observed at time of inspection.

5c. If performed, did the VEOs show compliance with permit limits? Yes No

5d. Additional comments:

6a. Did the review of operational logs and usage records show compliance? Yes No N/A

6b. Additional comments:

7a. Did the operational parameters show compliance with rule or permit limits? Yes No N/A

7b. Additional comments: P0090476 Title V Permit III.A.I.2e - Pike Sanitation was not able to produce a copy of their Asbestos Disposal Operating Procedure and Spill Contingency Plan. Scale house staff had no knowledge of the plan.

Section B, Part 3

1a. Is air pollution control equipment (APCE) required? (*if yes, complete Sec. C, part 1*) Yes No

2a. Was any performance testing required, since last inspection? (*if yes, complete Sec. C, part 2*)
 Yes No

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

To Be used for PCEs only	Evaluator: S. Anderson	Premise #: 0666000003
	Date: 6/20/2013	Fac. Name: Pike Sanitation Inc.

Section B, Part 1

- 1a. Emissions Unit ID: F002 1b. Description: Roadway/Parking
 2a. Is the emissions unit operating? Yes No
 2b. If No, when was the emissions unit last operated? _____
 3a. PTI status (installed after 1973): Issued Pending Requested Not Applicable
 3b. Installation date: 10/96 3c. PTI #: 06-07372 3d. Date approved: 4/06/2004
 4a. Operating permit status: Issued Pending Requested Registration
 4b. PTO expire date: 5/20/2008 4c. Renewal App. date: 12/17/2007
 5a. Pollutants subject to applicable requirements:
 PE OC VOC CO NOX SO2 Lead HAPs Other
 5b. If other, list pollutants:
 6a. Applicable rules / regulations: OAC 3745-31-05(A)(3)
 6b. Applicable federal regulations (mark all that apply):
 NESHAPS MACT NSPS PSD Emissions Offset SMPTI
 6c. Federal rule and Subpart:
 7a. Has the emissions unit been modified? Yes No N/A
 7b. Additional comments:

Section B, Part 2

- 1a. Are monitoring and record keeping being performed? Yes No N/A
 1b. Do the monitoring and recordkeeping comply with T&Cs? Yes No N/A
 1c. Additional comments:
 2a. Are deviation reports required to be submitted? Yes No (if no leave 2b-2c blank)
 2b. Do the required deviation reports comply? Yes No
 2c. Additional comments:
 3a. Are emissions unit reports required to be submitted? Yes No (if no leave 3b-3c blank)
 3b. Do the required emissions unit specific reports comply? Yes No
 3c. Additional comments:
 4a. Are any CEM/COM/other reports required? Yes No (if no leave 4b-4d blank)
 4b. Do the CEM/COM/other required reports comply? Yes No N/A
 4c. List any other reports required:
 4d. Additional comments:

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

5a. Were visible emissions observations (VEOs) performed? Yes No N/A

5b. If No, explain why not (*see instructions for guidance*): Facility is performing daily monitoring and record keeping. No visible emissions were observed at time of inspection.

5c. If performed, did the VEOs show compliance with permit limits? Yes No

5d. Additional comments:

6a. Did the review of operational logs and usage records show compliance? Yes No N/A

6b. Additional comments:

7a. Did the operational parameters show compliance with rule or permit limits? Yes No N/A

7b. Additional comments:

Section B, Part 3

1a. Is air pollution control equipment (APCE) required? (*if yes, complete Sec. C, part 1*) Yes No

2a. Was any performance testing required, since last inspection (*if yes, complete Sec. C, part 2*)
 Yes No

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

To Be used for PCEs only	Evaluator: S. Anderson	Premise #: 0666000003
	Date: 6/20/2013	Fac. Name: Pike Sanitation Inc.

Section B, Part 1

- 1a. Emissions Unit ID: P001 1b. Description: Diesel Engine 180 HP
 2a. Is the emissions unit operating? Yes No
 2b. If No, when was the emissions unit last operated? 8/2010
 3a. PTI status (installed after 1973): Issued Pending Requested
 Not Applicable
 3b. Installation date: 10/96 3c. PTI #: 06-07372 3d. Date approved: 4/06/2004
 4a. Operating permit status: Issued Pending Requested Registration
 4b. PTO expire date: 5/20/2008 4c. Renewal App. date: 12/17/2007
 5a. Pollutants subject to applicable requirements:
 PE OC VOC CO NOX SO2 Lead HAPs Other
 5b. If other, list pollutants:
 6a. Applicable rules / regulations: OAC rule 3745-31-05(A)(3), 17-11(B)(5)(a), 17-07(A)(1)
 6b. Applicable federal regulations (mark all that apply):
 NESHAPS MACT NSPS PSD Emissions Offset SMPTI
 6c. Federal rule and Subpart:
 7a. Has the emissions unit been modified? Yes No N/A
 7b. Additional comments:

Section B, Part 2

1. Are monitoring and record keeping being performed? Yes No N/A
 1b. Do the monitoring and recordkeeping comply with T&Cs? Yes No N/A
 1c. Additional comments: Not operating.
- 2a. Are deviation reports required to be submitted? Yes No (if no leave 2b-2c blank)
 2b. Do the required deviation reports comply? Yes No
 2c. Additional comments:
- 3a. Are emissions unit reports required to be submitted? Yes No (if no leave 3b-3c blank)
 3b. Do the required emissions unit specific reports comply? Yes No
 3c. Additional comments:
- 4a. Are any CEM/COM/other reports required? Yes No (if no leave 4b-4d blank)
 4b. Do the CEM/COM/other required reports comply? Yes No N/A
 4c. List any other reports required:
 4d. Additional comments:

OHIO EPA/DAPC ----- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

5a. Were visible emissions observations (VEOs) performed? Yes No N/A

5b. If No, explain why not (*see instructions for guidance*): Not operating.

5c. If performed, did the VEOs show compliance with permit limits? Yes No

5d. Additional comments:

6a. Did the review of operational logs and usage records show compliance? Yes No N/A

6b. Additional comments:

7a. Did the operational parameters show compliance with rule or permit limits? Yes No N/A

7b. Additional comments:

Section B, Part 3

1a. Is air pollution control equipment (APCE) required? (*if yes, complete Sec. C, part 1*) Yes No

2a. Was any performance testing required, since last inspection (*if yes, complete Sec. C, part 2*)

Yes No

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

To Be used for PCEs only	Evaluator: S. Anderson	Premise #: 0666000003
	Date: 6/20/2013	Fac. Name: Pike Sanitation Inc.

Section B, Part 1

- 1a. Emissions Unit ID: P002 1b. Description: Diesel Engine 180 HP
 2a. Is the emissions unit operating? Yes No
 2b. If No, when was the emissions unit last operated? 8/2010
 3a. PTI status (installed after 1973): Issued Pending Requested
 Not Applicable
 3b. Installation date: 10/96 3c. PTI #: 06-07372 3d. Date approved: 4/06/2004
 4a. Operating permit status: Issued Pending Requested Registration
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 5a. Pollutants subject to applicable requirements:
 PE OC VOC CO NOX SO2 Lead HAPs Other
 5b. If other, list pollutants:
 6a. Applicable rules / regulations: OAC rule 3745-31-05(A)(3), 17-11(B)(5)(a), 17-07(A)(1)
 6b. Applicable federal regulations (mark all that apply):
 NESHAPS MACT NSPS PSD Emissions Offset SMPTI
 6c. Federal rule and Subpart:
 7a. Has the emissions unit been modified? Yes No N/A
 7b. Additional comments:

Section B, Part 2

1. Are monitoring and record keeping being performed? Yes No N/A
 1b. Do the monitoring and recordkeeping comply with T&Cs? Yes No N/A
 1c. Additional comments: Not operating.
 2a. Are deviation reports required to be submitted? Yes No (if no leave 2b-2c blank)
 2b. Do the required deviation reports comply? Yes No
 2c. Additional comments:
 3a. Are emissions unit reports required to be submitted? Yes No (if no leave 3b-3c blank)
 3b. Do the required emissions unit specific reports comply? Yes No
 3c. Additional comments:
 4a. Are any CEM/COM/other reports required? Yes No (if no leave 4b-4d blank)
 4b. Do the CEM/COM/other required reports comply? Yes No N/A
 4c. List any other reports required:
 4d. Additional comments:

OHIO EPA/DAPC ---- FACILITY INSPECTION FORM (APPENDIX N)
FACILITY WIDE INFORMATION

5a. Were visible emissions observations (VEOs) performed? Yes No N/A

5b. If No, explain why not (*see instructions for guidance*): Not operating.

5c. If performed, did the VEOs show compliance with permit limits? Yes No

5d. Additional comments:

6a. Did the review of operational logs and usage records show compliance? Yes No N/A

6b. Additional comments:

7a. Did the operational parameters show compliance with rule or permit limits? Yes No N/A

7b. Additional comments:

Section B, Part 3

1a. Is air pollution control equipment (APCE) required? (*if yes, complete Sec. C, part 1*) Yes No

2a. Was any performance testing required, since last inspection (*if yes, complete Sec. C, part 2*)

Yes No